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May 25, 2022

By ECF & Email

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Abuchi Felix*, 21 Cr. 472 (KPF)

Dear Judge Failla:

I write to request a modification of Mr. Abuchi's bail conditions to allow him to travel to Kansas City, Missouri on May 31, 2022, for a two-week job training program from June 1, 2022 until June 15, 2022. Mr. Felix has secured training through Epic Go Live, an all-expenses paid job training program with the prospect of extended employment. He has been provided a plane ticket for May 31, 2022, accommodations at a hotel, and a per diem of \$50.00 for other expenses during the two-week training. The salary is \$32.00 per hour.

In the event that Mr. Felix successfully completes his training, counsel will make any additional application required. In the event that Mr. Felix is not retained beyond the two-week period, he will return to his residence and report as previously directed.

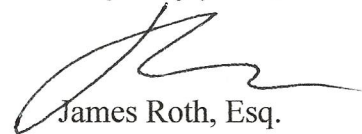
It is not feasible that he participate in the training with an ankle monitor. It is proposed that the conditions of his release be modified to provide that the requirement for electronic monitoring by means of an ankle monitor be removed and that in the alternative, Mr. Felix be required to report to his Pretrial Officer daily during his training period.

Mr. Felix has been fully compliant with the conditions of his release. He is currently supervised in New Jersey by Pretrial Officer Vincent Imbrosciano.

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Due to the nature of Mr. Felix's frequent out of state employment, the parties have no objection to having his GPS ankle monitor permanently removed as a condition. Pretrial Services and the government have no objection to this request, and both agree all other conditions of his bond remain in effect.

Very truly yours,



James Roth, Esq.

cc: PTO Josh Rothman (By Email)
PTO Izlia Sanchez (By Email)
PTO Vincent Imbrosciano (By Email)
AUSA Matthew King (By ECF & Email)
AUSA Micah Ferguson (By ECF & Email)

Application GRANTED. Mr. Felix shall be permitted to travel to Kansas City, Missouri for the purpose of attending the above-specified job-training program. In addition, given the position of the Government and the Pretrial Services Office, the conditions of Mr. Felix's bail shall be modified to permanently remove his ankle monitor. All other conditions of his bond remain in effect, and Mr. Felix shall report to his Pretrial Services officer daily for the duration of this training period.

The Clerk of Court is directed to terminate the pending motion at docket entry 79.

Dated: May 26, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE